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November 17, 2022

VIA ECF

Honorable Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 443
New York, New York 10007

Re: *In re Navidea Biopharmaceuticals Litigation, Case No. 19-cv-01578-VEC*

Dear Judge Caproni:

I represent Defendant/Counterclaim Plaintiff/Third-Party Plaintiff Dr. Michael M. Goldberg, M.D. (“Dr. Goldberg”) in the above-referenced matter. I write jointly on behalf of counsel for all parties to request a brief extension of time to submit a proposed schedule for further proceedings in this action as directed by the Court in its Order dated November 9, 2022. The reason for this request is that various preexisting professional obligations of counsel have made it difficult for counsel to identify sufficient time when all counsel is available to adequately confer on the proposed schedule within the time provided by the Order. Accordingly, counsel respectfully requests that the Court permit the parties until November 23, 2022 to submit their joint letter proposing a schedule for further proceedings. There have been no prior requests for the relief sought herein.

Thank for your attention to this matter.

Respectfully submitted,

/s/ Gregory Zimmer, Esq.

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cc: Barry Kazan, Esq.
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